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NEW YORK
MAINE
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May 14, 2010

Via ECF:

Honorable Elizabeth S. Stong
United States Bankruptcy Court
for the Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: Lessno LLC, Alleged Debtor
Chapter 7 (Involuntary Proceeding), Case Number: 1-09-44979 (ESS)

Dear Judge Stong:

On May 12th, I wrote to Your Honor to advise that a continued teleconference regarding outstanding discovery was not required.

Unfortunately, although counsel for the Alleged Debtor produced several responsive documents, the most relevant financial information was withheld. Mr. Connolly stated that he had in his possession “bank account, payables, financial statements and payroll information”, but wanted to keep the information confidential until a “mechanism could be established for their review.” No mechanism was proposed, so I immediately wrote to advise him that my clients required the information prior to the mediation, and noted that he could redact account information per FRCivPro 5.2(a). I further note that Mr. Connolly had previously provided June, 2009 bank account information, so there is no legitimate privilege.

My clients still plan to attend the mediation on May 17th, but asked that I note the Alleged Debtor’s non-compliance with our discovery demands and your Orders.

Thank you in advance for your continued assistance.

Very truly yours,

Joseph Sanchez, Esq.

cc: Michael J. Connolly, Esq.